

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604-3590

OCT 0 9 2009

REPLY TO THE ATTENTION OF:

E-19J

Apostle Islands National Lakeshore General Management Plan U.S. Department of the Interior National Park Service
Denver Service Center – Greg Jarvis
P.O. Box 25287
Denver, Colorado 80225

Re: U.S. EPA Comments on the Draft General Management Plan/Wilderness
Management Plan/Environmental Impact Statement for Apostle Islands National
Lakeshore, Bayfield and Ashland Counties, Wisconsin - EIS No. 20090283

Dear Mr. Jarvis:

The U.S. Environmental Protection Agency (U.S. EPA) has reviewed the National Park Service's (NPS) Draft Environmental Impact Statement (EIS), which evaluates the Apostle Islands National Lakeshore's (National Lakeshore) proposed Management Plan. Our review was conducted pursuant to the National Environmental Policy Act (NEPA), the Council on Environmental Quality's NEPA Implementing Regulations (40 CFR 1500-1508), and Section 309 of the Clean Air Act.

The National Lakeshore has been operating under a comprehensive management plan completed in 1989. Since that plan was completed, visitor use patterns have changed, people are seeking new recreational activities in the National Lakeshore, and the Gaylord Nelson Wilderness was designated in December 2004. Additionally, scoping activities and visitor surveys identified several issues that need to be addressed as part of a revised management plan.

The Draft EIS presents and analyzes the potential impacts of four alternatives. Alternative 1, the "no-action" alternative, is a continuation of the existing management approach. The concept for Alternative 2, the Preferred Alternative, is providing opportunities for more people to have an island experience. The concept for Alternative 3 is providing primitive, lake-oriented recreation and educational opportunities including new opportunities, and the concept for Alternative 4 is to provide a greater variety of structured recreation opportunities on the islands, in non-wilderness areas, and on the mainland. Alternatives focus on what resource conditions and what visitor uses, experiences, and opportunities should be available at the National Lakeshore. Details of how these conditions, uses, and experiences should be achieved will be analyzed as part of future detailed plans or studies.

Based on our review of the Draft EIS, we have rated the Preferred Alternative as Lack of Objections. This rating indicates that our review did not identify any potential environmental impacts requiring substantive changes to the Preferred Alternative. Although we have no substantive comments on the Draft EIS, we recommend clarification of the following aspect of the Draft Management Plan.

The foundations for making user capacity decisions as part of the Management Plan include management zones, which qualitatively describe desired resource conditions and visitor experiences, including appropriate recreation activities, for different locations throughout the National Lakeshore. The Draft EIS presents five potential management zones. The three action alternatives were formulated by placing the management zones in different configurations on the National Lakeshore map according to the overall concept of each alternative.

Charts conveying the acreages and percentages of land assigned to each of the five management zones under the different action alternatives are included in the analysis portion of the Draft EIS. However, a similar table conveying current management zone acreages and percentages set by the 1989 comprehensive management plan is not provided in the Draft EIS. We recommend including these details of the 1989 zoning arrangement. Producing a table similar to *Table 7: Management Zones in Alternative 2* would be beneficial for comparing and comprehending differences in management zones between the current and proposed management plans.

We appreciate the opportunity to be a part of the planning effort for the National Lakeshore. We look forward to receiving a copy of the Final EIS. Should you have any questions concerning the contents of this letter, please do not hesitate to contact me or Kathleen Kowal of my staff at (312) 353-5206 or send email to kowal.kathleen@epa.gov.

Sincerely,

Kenneth A. Westlake

Chief, NEPA Implementation Section

Smill A. Willelle

Office of Enforcement & Compliance Assurance

cc: James Nepstad

**Enclosure: Ratings Summary**